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Via electronic filing

Ben Holly
Senior Campaign Finance Analyst
Reports Analyst Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Re: C90004185

Dear Mr. Holly:

The purpose of this letter is to respond to your letter dated January 2, 2013, regarding the July Quarterly Report (4/1/2012 to 6/30/2012) of NARAL Pro-Choice America, identification number C900041485.

Item 1 in your letter concerns two expenditures of \$500.00 each on 6/5/12 which purportedly were Late Filed by the Committee. These expenditures were filed in a 48-hour report to the Commission on 6/20/12 (page 3) which was the date that the \$10,000 threshold for filing 48-hour reports was reached.

Items 2 and 3 of your letter asks about expenditures on 24- or 48-hour reports that do not appear on Schedule 5-E of this report and also asks about expenditures that appear on Schedule 5-E of this report but not on NARAL Pro-Choice America's 24- or 48-hour reports.. We have compared your attachments to our records and there is a corresponding entry on Schedule 5-E, and vice versa. The expenditure amounts differ, due to the nature of the 24- or 48-hour reports as estimates; Schedule 5-E reflects the final and accurate expenditure amounts. In a handful of instances the date of public dissemination of an expenditure on a 48-hour reported expense may have moved a day due to vendor delays in production.

Finally in Item 4, your letter inquires about the reporting of contributors on Form 5. The Commission's regulations require the disclosure of contributors when a "contribution was made for the purpose of furthering the reported independent expenditure." 11 C.F.R. ?109.10(e)(1)(vi). NARAL Pro-Choice America had no such contributors to report; as a matter of policy, it does not accept contributions earmarked for a specific political purpose.

If you need any further information, please do not hesitate to contact me.

Very truly yours,

Ezra W. Reese
Counsel to NARAL Pro-Choice America
